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February 2, 2018

Marlene Dortch
Secretary
Federal Communications Commission
445-12th Street SW
Washington, DC 20554

Via ECFS

Re: **Notice of Global Connection Inc. of America of Oral *Ex Parte* Presentation;
WC Docket No. 17-54**

Dear Ms. Dortch:

On January 31, 2018, John J. Heitmann of Kelley Drye & Warren LLP participated in a telephone call with Jodie May, Assistant Division Chief of the Competition Policy Division of the Wireline Competition Bureau on behalf of Global Connection Inc. of America (Global). The purpose of the call was to discuss a transaction between Global and Odin Mobile, LLC (Odin Mobile and, together with Global, the Parties) pursuant to which control and ownership of Global would be transferred to Odin (the Transaction).¹

During the course of the call, we discussed the consent decree entered into by Global in December, 2017² and I communicated Global's commitment to continuing compliance with the consent decree, following consummation of the Transaction. Global will submit a separate filing into the docket reflecting this commitment. In addition, we discussed the need for an update to the Transaction docket filings. On behalf of the Parties, I committed that they would review the

¹ *Domestic Section 214 Application Filed for the Transfer of Control of Global Connection Inc. of America to Odin Mobile, LLC, Streamlined Pleading Cycle Established*, WC Dkt. 17-54, DA17-253 (rel. Mar. 15, 2017); *Notice of Removal of Domestic Section 214 Application from Streamlined Treatment*, WC Dkt. 17-54, DA17-304 (rel. Mar. 30, 2017). I clarified that Kelley Drye & Warren, LLP is acting as regulatory counsel for both Global and Odin with respect to the Transaction.

² *In the Matter of Global Connection Inc. of America d/b/a Stand Up Wireless*, File No.: EB-IHD-13-00010970, ORDER (rel. Dec. 29, 2017).

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record and update it as necessary.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Sincerely,



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Counsel for Global Connection Inc. of America

cc: Jodie May